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June 28, 2021

By ECF

The Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

Re: Iacovacci v. Brevet Holdings, LLC, et al., 18 Civ. 8048 (WHP)

Dear Judge Pauley:

Pursuant to the Court's Individual Practices, the parties write jointly to request an extension of the discovery deadlines in the above-captioned matter.

The operative scheduling order in this case, dated March 18, 2021 (Dkt. 208), sets the completion of all fact discovery for June 30, 2021. The parties met and conferred and have agreed to coordinate the depositions of witnesses in this case and the New York State action (*Iacovacci v. Brevet Holdings, LLC*, No. 158735/2016 (Sup. Ct. N.Y. Cty.)). In light of the parties' agreement, we respectfully request that fact discovery be extended to October 7, 2021, which is the note of issue deadline in the New York State action, to accommodate the coordinated depositions. This coordination will promote efficiency and reduce the burden on witnesses and the Court. The parties recognize that other contemplated deadlines in this case will require amendment in light of the parties' agreement, and have set out proposed dates in the attached Proposed Order.

The parties are mindful that the Court has granted six prior requests for an extension of time to complete discovery and will work diligently together to progress this case promptly under the proposed revised case schedule.

Respectfully submitted,

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